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cc:
Subject: NEPA comments

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September 22, 2002

NEPA Task Force
P.O. Box 221150
Salt Lake City, UT 84122

To Whom it May Concern:

I would like to comment on the July 9, 2002 Federal Register notice regarding the National Environmental Policy Act (NEPA) process.

Many issues surrounding this Act and its implementation need improvement. Implementation of NEPA fails to meet the letter or the intent of the law, and is used to justify an agenda or pre-determined decision of an agency or an individual.

Such was the case with the National Park Services feasibility study on the Gaviota Coast.

A minimum 90-day comment period should be required for all actions. This would allow the general public time to acquire information about the proposed action, review and research the proposed action, compose their comments and submit them. The shorter comment periods do not provide adequate time to research the proposals, especially in rural areas where internet is limited. Each agency has it's own documents, style and comment periods which vary greatly, making it even more difficult. There should be a standardized process.

Any NEPA action posted in the Federal Register should site the full description of the proposed action - ie: the title should clearly identify the proposed action.... in plain English, NOT legal-speak! And should be made available via the internet in html, text or pdf file.

NEPA should require notification of residents in the immediate area of any proposal in a variety of ways to be sure that the public is made fully aware of the proposals and, therefore, the opportunity to comment. All agencies should be required to send letters of notification to organizations and elected officials in the area and publish notices in all area newspapers in a special section of the paper (not hidden in the want ads). And for those who do have access to the internet there should be a dedicated website for each state to post all NEPA actions and proposals, both EA and EIS.

Most importantly, the public should have access to as much information that is available to be able to understand the scope and proposed results. Open communication will generate cooperation. As with the

Gaviota Coast feasibility study it was a result of seven years of collusion with environmental agencies, county government and the National Park Service without any affected landowner input.

All agencies must be required to cooperate with all parties involved not just the special interest groups but the area residents that will directly be affected by the proposals.

Scheduled meetings such as public meetings (public comment only) or open house/informational meetings (public comment is not accepted), do not address the needs of the public. These meeting are a waste of our time, agency personnels' time and a waste of money. Many of the agency personnel who attend these meeting are not prepared or authorized to answer questions. This recently happened at the National Park Services' Gaviota Coast Forum held in Buellton, CA this past August. The lady who represented the Park Service didn't have a clue as to what or where the Gaviota Coast was. And many times the information needed by the public is not in the agencys' documentation.

I also suggest that at the time of the draft documents' publication, the person responsible for the action should certify that all information in the document is accurate and true. As it stands, the information is often incorrect and there is no source for the reader to verify information or have it corrected. Accountability should be the standard and there should be a process for all documents to be certified as accurate and true. They should also provide an email address both in the Federal Register notice and the EA or EIS, for a contact person to answer any and all questions, additional information or to receive comments.

One of the problems with using email in the NEPA process is that a large number of people, especially in rural parts of the country, do not have access to good, reliable or low cost internet connections. Information should be sent through the postal service.

If they are not notified this way many will never learn of the proposals.

Another issue is the use of the phrase "no action alternative" within all NEPA documents, including EAs and EISs. The term 'no action' means 'no change or current management' yet it is used as making a change to the permitted action. This is not only misleading to the public trying to analyze the document, but it does not meet either the intent or the letter of the law.

Multi-use programs and management should be considered rather than single-issue management, and socioeconomic impacts must be considered before any changes to any management plans occur. Agencies must consider all impacted issues to adequately fulfill NEPA's requirements.

Thank you for allowing me to comment on this issue.

CQ511

Sincerely,

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